

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	-----X	
	:	
	:	Case No. 23-90147-H2-7
MOUNTAIN EXPESS OIL COMPANY, et al. ¹	:	
	:	(Chapter 7)
	:	
Debtors.	:	Jointly Administered

**DECLARATION OF DISINTERESTEDNESS
OF LORI LAPIN JONES, ESQ.**

I, Lori Lapin Jones, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true to the best of my knowledge, information, and belief:

Background

1. I am an attorney in good standing admitted to practice in the State of New York, and in the United States District Courts for the Southern District of New York and the Eastern District of New York. I submit this declaration in support of the application of Janet S. Northrup, in her capacity as chapter 7 trustee in the above jointly administered cases, to retain me as Fee Reviewer and Consultant.

2. I have been practicing law since 1982. Following a clerkship in the United States Bankruptcy Court for the Southern District of New York for the Honorable Tina L. Brozman, I spent seventeen years in private practice working on large bankruptcy cases and out-of-court restructurings at two New York City law firms. In 2005, I founded Lori Lapin Jones PLLC where my practice has focused on fiduciary work in the bankruptcy field. I am a member of the panel of chapter 7 trustees for the Eastern District of New York and Southern District of New York, and I have served or currently serve in other fiduciary capacities including as chapter 11 trustee, examiner, mediator, federal court receiver, and post-confirmation plan administrator.

3. I served as Independent Fee Examiner in the chapter 11 cases of Voyager Digital Holdings, Inc. *et al* (Case No. 22-10943 MEW) (S.D.N.Y.). I am currently serving as a Fee Reviewer in the chapter 11 case of Kidde-Fenwal, Inc. (Case No. 23-10638 LSS) (D. Del) and have just concluded serving as a Fee Reviewer in the chapter 11 cases of Aeero Technologies LLC (Case No. 22-02890 JJG) (S.D. Ind). I have served as a fee consultant, and my firm, Lori Lapin Jones PLLC, has represented a fee examiner in a case in the United States Bankruptcy Court for the Southern District of New York.

¹ A complete list of each of the Debtors in these Chapter 7 cases may be obtained on the Court's website at www.ecf.txsb.uscourts.gov. The location of Debtor Mountain Express Oil Company's principal place of business and the Debtors' service address in these Chapter 7 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

4. I am a Fellow of the American College of Bankruptcy (Co-Chair of the Education Committee for the Second Circuit), a member of the Second Circuit Judicial Council Committee on Civic Education & Public Engagement, a member of the United States Trustee/S.D.N.Y. Liaison Group, and a member of the Chapter 11 Lawyers' Advisory Committee for the Eastern District of New York (Vice Chair 2014-2018). I am also the Vice Chair of the Board of Directors for the Organization for Autism Research.

Disinterestedness

5. I submit this Declaration to establish that I am a "disinterested person" as that term is defined in 11 U.S.C. § 101(14) ("Bankruptcy Code") to serve as a fee reviewer ("Fee Reviewer") in the jointly administered chapter 7 cases of Mountain Express Oil Company, *et al.* (collectively "Debtors"). Unless otherwise stated, I have personal knowledge of the facts set forth herein.

6. I have reviewed the attached list of professionals ("Professionals") who were retained in these cases, the docket in the Debtors' cases, the potential parties-in-interest list [ECF No. 281-1], and the Master Service List [ECF No. 1233].

7. With respect to my "disinterestedness" under Section 101(14) of the Bankruptcy Code, I provide the following information:

- a. I am not, nor have been, during the pendency of the Debtors' cases, a creditor, equity security holder or insider of any of the Debtors.
- b. I am not, nor have been, a director, officer, or employee of any of the Debtors.
- c. I do not have an interest materially adverse to the interests of the bankruptcy estates or any class of creditors or equity security holders by reason of any direct or indirect relationship to, connection with, or interest in, any of the Debtors.
- d. I am not a relative of the chapter 7 Trustee, any Bankruptcy Judge of the United States Bankruptcy Court for the Southern District of Texas, or the United States Trustee for Region 6.
- e. I have not and do not represent the Debtors or their affiliates, if any. I have not and do not represent any party in interest in connection with the Debtors' chapter 11 cases. Except as set forth below, I do not have any connection with any of the Professionals or other parties-in-interest or their respective attorneys, financial consultants, or accountants that are reflected on the Court's docket.
 - i. In my past, current or future roles as chapter 7 trustee, chapter 11 trustee, post-confirmation trustee or plan administrator, examiner, mediator, fee examiner, fee reviewer, or other fiduciary in other cases, I may have had, may have and may in the future have interactions and connections with parties-in-interest and professionals retained by parties-in-interest, but any such interactions and connections would be in cases unrelated to the

Debtors' cases, and Lori Lapin Jones PLLC has not represented any of the parties-in-interest or their professionals.

Engagement

8. My engagement by the chapter 7 Trustee will entail the review and analysis of fee applications of the Professionals during the chapter 11 period, providing a confidential written report(s) to the chapter 7 Trustee (if requested) based on my review and analyses of the fee applications of the Professionals, if requested, negotiating and/or assisting the Trustee in negotiating any reductions to the fee applications, and work related to the above.

Compensation and Staffing

9. My hourly rate is \$650.00. I have agreed to a discount and will charge the estates an hourly rate of \$450.00 for my services plus out-of-pocket disbursements. My out-of-pocket disbursements will include the services of National CRS, LLC ("NCRS"), as Database Service Provider, who will download the time records of the Professionals into proprietary software and perform related work that will facilitate my review of the fee applications. Attached is a declaration of disinterestedness of the Managing Member of NCRS. The ability for me to perform my work shall be dependent on the chapter 11 Professionals providing me their time records in Excel or LEDES format. I understand that payment of my fees and expenses (including NCRS) will be subject to interim and final applications for compensation and reimbursement of expenses as well as the interim compensation procedures order applicable to the Trustee's professionals. I am informed by the Trustee (through counsel) that the DIP Agent in these cases has agreed to the use of its cash collateral to pay my fees and expenses (including those of NCRS).

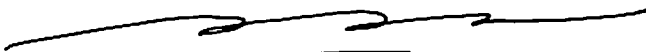
10. As set forth above, my compensation is on an hourly basis and will not be tied to or dependent upon any reductions recommended or achieved.

11. Except as permitted under Section 504 of the Bankruptcy Code, I will not share any compensation or reimbursement received in connection with these chapter 11 cases with another person.

12. If I discover any facts materially bearing on the matters described herein, I will supplement the information contained in this Declaration.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of November 2023


Lori Lapin Jones

Professionals

Pachulski Stang Ziehl & Jones LLP
Lugenbuhl Wheaton Peck Rankin & Hubbard
McDermott Will & Emery LLP
Axin, Veltrop & Harkrider LLP
FTI Consulting, Inc.
Raymond James & Associates, Inc.
Young Moore and Henderson, P.A.
Akerman LLP
Gable & Gotwals, P.C.
Province LLC